

1 Gregory B. Thomas (SBN 239870)
E-mail: gthomas@bwslaw.com
2 Christopher E. Brumfiel (SBN 214866)
E-mail: cbrumfiel@bwslaw.com
3 Temitayo O. Peters (SBN 309913)
E-mail: tpeters@bwslaw.com
4 Jasper L. Hall (SBN 341113)
E-mail: jhall@bwslaw.com
5 BURKE, WILLIAMS & SORENSEN, LLP
1999 Harrison Street, Suite 1650
6 Oakland, California 94612-3520
Tel: 510.273.8780 Fax: 510.839.9104
7

8 Attorneys for Defendants COUNTY OF SAN
JOAQUIN, PATRICK WITHROW and FELIPE
MENDOZA
9

10 UNITED STATES DISTRICT COURT
11
12 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

13 ARMANDO SALGADO SR., an individual,
14 and ARLINDA SALGADO, an individual,
and as successor in interest to deceased
ARMANDO ADAM SALGADO,

15 Plaintiffs,

16 v.

17 COUNTY OF SAN JOAQUIN; PATRICK
18 WITHROW, an individual; FELIPE
MENDOZA, an individual; and DOES 1 to 10,
inclusive,

19 Defendants.
20

Case No. 2:22-cv-01024-MCE-AC

**STIPULATION AND ORDER FOR
LIMITED EXTENSION OF FACT
DISCOVERY CUTOFF TO ALLOW FOR
DEPOSITION OF PLAINTIFF ARLINDA
SALGADO**

Judge: Morrison C. England, Jr.

Trial Date: N/A

21
22 Pursuant to Local Rules 143 and 144, subdivisions (a) and (d), Defendants COUNTY OF
23 SAN JOAQUIN, FELIPE MENDOZA, and PATRICK WITHROW (collectively “County
24 Defendants”) and Plaintiffs ARMANDO SALGADO, SR. and ARLINDA SALGADO (collectively
25 “Plaintiffs”), hereby stipulate as follows:

26 WHEREAS, Fact Discovery Cut-Off in the instant action is November 15, 2023 (Dkt No.
27 20);

28 WHEREAS, the deposition of Plaintiff ARLINDA SALGADO was formally noticed by

1 County Defendants to take place on October 26, 2023;

2 WHEREAS, on October 25, 2023, counsel for Plaintiffs requested that the deposition of
3 Plaintiff ARLINDA SALGADO be re-scheduled as a result of Plaintiff ARLINDA SALGADO's
4 illness;

5 WHEREAS, counsel for County Defendants agreed to re-schedule the deposition of
6 Plaintiff ARLINDA SALGADO in light of her illness;

7 WHEREAS, the parties have agreed that Plaintiff ARLINDA SALGADO's deposition
8 shall proceed on December 14, 2023;

9 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiffs and
10 County Defendants, through their respective counsel, that the Fact Discovery Cut-Off Date of
11 November 15, 2023, shall be extended for the sole and exclusive purpose of completing the
12 deposition of Plaintiff ARLINDA SALGADO on December 14, 2023. All other dates shall
13 remain as scheduled.

14 Dated: November 14, 2023

BURKE, WILLIAMS & SORENSEN, LLP

16 By: /s/ Christopher E. Brumfiel

17 Gregory B. Thomas
18 Christopher E. Brumfiel
19 Attorneys for Defendants
20 COUNTY OF SAN JOAQUIN, PATRICK
21 WITHROW, and FELIPE MENDOZA

21 Dated: November 9, 2023

O'HARA LAW APC

23 By: /s/ Kevin O'Hara

24 Kevin W. O'Hara
25 Attorneys for Plaintiffs
26 ARMANDO SALGADO SR. and
27 ARLINDA SALGADO

28 ////

28 ////

28 ////

1 Dated: November 9, 2023

LAW OFFICES OF VICKI I. SARMIENTO

2 By: /s/ Vicki I. Sarmiento

3 Vicki I. Sarmiento
4 Attorneys for Plaintiffs
5 ARMANDO SALGADO SR. and
6 ARLINDA SALGADO

7 **SIGNATURE ATTESTATION**

8 In accordance with Local Rule 131(b) I, Christopher E. Brumfiel, attest that I have obtained
9 concurrence in the filing of this documents from the other signatories listed above.

10 By: /s/ Christopher E. Brumfiel

ORDER

Based on the Parties' stipulated request and good cause appearing, IT IS ORDERED THAT the fact discovery cutoff in this case is extended to December 14, 2023, for the sole and exclusive purpose of completing the deposition of Plaintiff ARLINDA SALGADO.

IT IS SO ORDERED.

Dated: November 16, 2023


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE